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June 10, 2021

VIA ECF

Honorable Robert M. Levy
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Singer, et al. v. Bank of Palestine*, 19-cv-006 (ENV) (RML)

Dear Magistrate Judge Levy:

We represent Plaintiffs in the above-referenced action.

On April 30, 2021, Judge Vitaliano granted the parties 120 days for discovery to establish whether the Court has personal jurisdiction over Bank of Palestine. *See* ECF No. 46. On May 10, 2021, the parties submitted a Joint Stipulation and Proposed Protective Order that would provide confidentiality for any discovery produced. *See* ECF No. 47.

Accordingly, in order to help facilitate the ongoing discovery process, Plaintiffs request that Your Honor enter the Proposed Protective Order.

Respectfully submitted,

/s/ Gary M. Osen

cc: All Counsel